

STATE OF INDIANA       )  
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 COUNTY OF MARION     )  
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IN THE MARION SUPERIOR COURT

CAUSE NO.:

**JORDAN NICOLE DALTON,  
 ERICA MARIE O’NEILL,  
 LENORA ANNE FOSTER,  
 and KYRRHA MYERS**

**Plaintiffs**

**v.**

**BREWDOG USA INC., JAMES WATT and  
 JASON BLOCK**

**Defendants**

**COMPLAINT**

Plaintiffs, Jordan Dalton, Erica O’Neill, Leah Foster and Kyrriha Myers for their  
 Complaint against Defendants BrewDog, USA, INC., James Watt, and Jason Block, state as  
 follows:

1. Plaintiff, Jordan Nicole Dalton is a former employee of BrewDog USA and a resident of Marion County Indiana.
2. Plaintiff, Erica Marie O’Neill is a former employee of BrewDog USA and a resident of Marion County Indiana.
3. Plaintiff, Lenora Anne Foster is a former employee of BrewDog USA and a resident of Marion County Indiana.
4. Plaintiff, Kyrriha Myers is a former employee of BrewDog USA and a resident of Marion County Indiana.

5. Defendant BrewDog USA is a Delaware Corporation located at 96 Gender Road, Canal Winchester, Ohio 43110, with an Indiana registered agent of CT Corporation System, 334 North Senate Avenue, Indianapolis IN 46204.

6. Defendants James Watt and Jason Block are executives of BrewDog USA and all relevant time periods were acting on behalf of Defendant BrewDog, which is liable for their statements pursuant to the doctrine of respondeat superior.

7. Plaintiffs all worked for BrewDog in Indianapolis Indiana until they were summarily terminated on March 8, 2021.

8. Following Plaintiffs' termination, BrewDog executives James Watt and Jason Block made false and defamatory statements about Plaintiffs.

9. On or about March 10, 2021, executive Jason Block stated, in writing: "As we prepare to reopen our Indianapolis location in a few weeks, we assessed our team and the experience we strive to provide to our customers. With those standards in mind, some team members had their employment terminated because of prior performance issues..."

10. On or about March 10, 2021, executive James Watt stated, in writing: "The 4 terminated had a history of lateness, flippant behaviour towards management, threatening behaviour towards other team members, reported theft of drinks/food, inappropriate comments to customers, and a negativity towards BrewDog."

11. Defendants made other false and defamatory statements regarding Plaintiffs, and otherwise exercised an intent to harm Plaintiffs in their profession and employment with false accusations and assassinations of their good character.

12. These statements were made by wealthy men in a position of power who intentionally harmed and defamed Plaintiffs with false accusations.

13. Plaintiffs were never warned or disciplined by any person at BrewDog for the alleged performance issues and criminal activity they were accused of by these high-ranking men who are executives at BrewDog.

14. These statements constitute defamation and defamation per se.

15. These statements were intended by these Defendants to harm Plaintiffs and in fact did cause Plaintiffs great harm, financial injury and emotional distress.

16. These statements are reckless, outrageous and constitute grounds upon which punitive damages should be awarded to Plaintiffs and against these Defendants.

WHEREFORE, Plaintiffs, Jordan Dalton, Erica O'Neill, Leah Foster and Kyrria Myers seek all available money damages, including but not limited to compensatory and punitive damages against Defendants BrewDog, USA, INC., James Watt, and Jason Block, and for all other proper relief.

**JURY DEMAND**

Plaintiffs seek a trial by jury.

Respectfully submitted,  
*/s/ Mark Waterfill*  
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